

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
ANDERSON DIVISION

Pinnacle Financial Partners as)
 Conservator and Guardian ad Litem for)
 Jane Doe, a minor child, and Mother and)
 Father Doe,)
)
 Plaintiffs,)
)
 vs.)
)
 Anita Richardson and Pickens County)
 School District,)
)
Defendants.)

C.A. No. 8:18-cv-02584-DCC

**DEFENDANT’S ANSWERS TO LOCAL
RULE 26.01 INTERROGATORIES**

Defendants, Pickens County School District and Anita Richardson, by and through the undersigned counsel, hereby respond to the Court’s Local Rule 26.01 Interrogatories as follows:

(A) State the full name, address, and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.

ANSWER:

None.

(B) As to each claim, state whether it should be tried jury or nonjury and why.

ANSWER:

Plaintiff has requested a jury trial.

(C) State whether the party submitting these responses is a publicly owned company and separately identify:

(1) each publicly owned company of which it is a parent, subsidiary, partner, or affiliate;

- (2) each publicly owned company which owns ten percent or more of the outstanding shares or other indicia of ownership of the party; and
- (3) each publicly owned company in which the party owns ten percent or more of the outstanding shares.

ANSWER:

Not Applicable.

(D) State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division). See Local Civil Rule 3.01.

ANSWER:

The claim is properly filed in this division because it includes a federal claim based on conduct that allegedly occurred in Pickens County.

(E) Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide:

- (1) a short caption and the full case number of the related action;
- (2) an explanation of how the matters are related; and
- (3) a statement of the status of the related action. Counsel should disclose any cases which may be related regardless of whether they are still pending. Whether cases are related such that they should be assigned to a single judge will be determined by the Clerk of Court based on a determination of whether the cases: arise from the same or identical transactions, happenings, or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

ANSWER:

Not applicable.

(F) If the defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

ANSWER:

Defendant Pickens County School District's legal name is the School District of Pickens County.

(G) If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of said liability.

ANSWER:

All potentially responsible parties have been named.

Respectfully submitted,

HALLIGAN MAHONEY WILLIAMS SMITH
FAWLEY & REAGLE, PA

By: s/ Allison Aiken Hanna
Allison Aiken Hanna, Fed. I.D. No. 7173
ahanna@hmwlegal.com

Thomas K. Barlow, Fed. I.D. No. 7483
tbarlow@hmwlegal.com

P.O. Box 11367
Columbia, South Carolina 29211
(803) 254-4035

Attorneys for Defendants

October 16, 2018

Columbia, South Carolina